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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALYSIA WRENN, an individual,

Case No.: 2:23-cv-00710-CDS-EJY

Plaintiff,

vs.

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS
AND MOTION TO CONSOLIDATE**

HANKINS & SOHN PLASTIC SURGERY
ASSOCIATES, P.C., dba HANKINS & SOHN
PLASTIC SURGERY ASSOCIATES,
SAMUEL M. SOHN, WARREN TRACY
HANKINS, ROE DATA SECURITY
COMPANY, ROE NETWORK SECURITY
COMPANY, DOES I through XXX, inclusive
and ROE BUSINESS ENTITIES I through
XXX, inclusive.

Defendants.

**STIPULATION AND PROPOSED ORDER TO EXTEND TIME FOR PLAINTIFF
TO RESPOND TO DEFENDANT'S MOTION TO DISMISS AND MOTION TO
CONSOLIDATE**

Plaintiff Jennifer Tausinga (“Plaintiff”) and Defendant. Hankins & Sohn Plastic Surgery Associates dba Hankins Plastic Surgery Associates, P.C. (“Defendant”) stipulate as follows:

25 1. On July 14, 2023, Defendant filed a Motion to Consolidate this case with Case No.
26 2:23-cv-00710-CDS-DJA [ECF No. 9] and a Motion to Dismiss [ECF No. 12].

27 2. The operative deadline for Plaintiff to respond to both motions is July 28, 2023 [ECF
28 No. 9] [ECF No. 10].

1 3. The past two weeks the parties have been engaged in discussions to stipulate to the
 2 motion to consolidate Case No. 2:23-cv-00824-RFB-DJA with Case No. 2:23-cv-00710-CDS-DJA
 3 and file a consolidated complaint. The parties are currently working on the terms of the stipulation.

4 4. Plaintiff has requested and Defendant has agreed to an extension of the current
 5 deadlines for both motions up to and including August 11, 2023 to provide additional time for the
 6 parties to focus on consolidating the two matters, while avoiding the expense of briefing and arguing
 7 the issues.

8 5. The parties agree that there is good cause for this extension.

9 6. This is the first request for an extension, and it is made in good faith and not for
 10 purpose of delay.

11 DATED this 28th day of July 2023.

12 **THE BOURASSA LAW GROUP**

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ORDER

On the basis of good cause, IT IS ORDERED that the deadline for Plaintiff to respond to Defendant's Motion to Consolidate [ECF No. 9] and Defendant's Motion to Dismiss [ECF No. 12] is extended up to and including August 11,2023.

IT IS SO ORDERED.

Eayna L. Zouchah
UNITED STATES MAGISTRATE JUDGE

DATED: July 31, 2023

LADAH LAW

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